

# **Georgia Department of Natural Resources**

## **Environmental Protection Division, Air Protection Branch**

4244 International Parkway, Suite 120, Atlanta, Georgia 30354

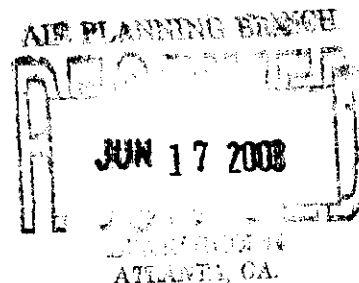
Phone: 404/363-7000 FAX: 404/363-7100

Lonice C. Barrett, Commissioner

Harold F. Reheis, Director

June 16, 2003

Ms. Kay Prince  
Chief, Air Planning Branch  
U.S. EPA, Region IV  
Air, Pesticides & Toxics Management Division  
61 Forsyth Street, SW  
Atlanta, Georgia 30303-8909



RE: June 16, 2003 Early Action Compact milestone submittal

Dear Ms. Prince:

The Georgia Environmental Protection Division (EPD), Catoosa County, and Walker County have been actively participating in the Chattanooga Early Action Compact (EAC). This letter fulfills the requirements of the June 16, 2003 milestone under the EAC agreement.

The attached list of potential local control measures submitted to you by the State of Tennessee has been developed by working very closely with various stakeholders, including EPD, Catoosa County, and Walker County. We will continue with the stakeholder participation process for the EAC and are confident that this list will be sufficient to ensure development of an appropriate control strategy to achieve attainment of the 8-hour ozone standard by 2007.

Should you or your staff have any questions regarding our submittal, please contact Dipan Shah at (404) 363-7014.

Sincerely,

Ron Methier, Chief  
Air Protection Branch

Enclosure

Cc: Mr. Bob Colby, Chattanooga-Hamilton County (w/enclosure)  
Mr. Barry Stephens, Tennessee Division of Air Pollution Control (w/enclosure)  
Honorable Bebe Heiskell, Walker County Commissioner (w/enclosure)  
Honorable Winford Long, Catoosa County Commissioner Chairman (w/enclosure)



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
Air Pollution Control Division  
9th Floor, L & C Annex, 401 Church Street, Nashville, TN 37243

June 12, 2003

Kay T. Prince, Chief of Air Planning Branch  
US EPA, Region IV  
Atlanta Federal Center, 12<sup>th</sup> Floor  
61 Forsyth Street, SW  
Atlanta, GA 30303

RE: Submittal of "Likely" Control Measures for Early Action Compact Areas

Dear Ms. Prince:

In accordance with the Early Action Compact (EAC) agreement, you will find enclosed the "likely" list of control measures for each of the EAC areas in Tennessee. This is being submitted on behalf of each EAC area to comply with the June 16, 2003 milestone. Each compact area has selected control measures for their county, which are being considered as a means to achieve the 8-hour ozone standard by 2007.

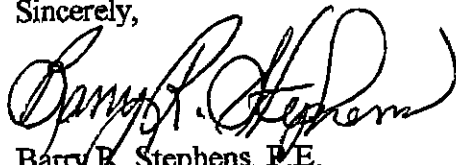
The following information is enclosed:

- Executive Summary
- EPA - Checklist of June 16, 2003, Control Measures List
- Table 1 - Summary of likely EAC Control Measures by county with chosen control measures
- Table 2 - List of Control Measures with ID assigned to interpret Table 1
- Table 3 - List of likely Statewide Control Measures being considered
- Tennessee Map - Showing 8 hour ozone design values by MSA for 2000-2002
- Copy of the April 14, 2003, Memorandum from Lydia N. Wegman
- Likely Control Measures List and the signatory pages for the Chattanooga area, Haywood County, Knoxville area, Memphis area, Nashville area, Putnam County and the Tri-Cities area. Lawrence County submitted a request to opt out of the EAC.

Kay T. Prince, EPA, Region IV  
June 12, 2003  
Page 2

I believe this submittal satisfies all requirements of the June 16<sup>th</sup> EAC milestone, but if more information is needed do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry R. Stephens". The signature is stylized with a large, looping initial "B" and a long, sweeping underline.

Barry R. Stephens, P.E.

Director

Division of Air Pollution Control

cc: Karen Borel & Dick Schutt, EPA, Region IV  
Local Air Programs  
Tennessee Air Pollution Control Board  
EAC Signatories

## EXECUTIVE SUMMARY

Enclosed please find the necessary documentation to meet the Ozone Early Action Compact (EAC) deadline for submittal of Likely Control Measures for Tennessee due June 16, 2003. This documentation meets the guidance provided in the letter signed by Lydia N. Wegman sent to appropriate Regional Administrators and Air Directors dated April 4, 2003 (enclosed for reference). The following describes the remaining contents of this submittal.

1. First find the June 16, 2003, EPA Control Measures Checklist.
2. Table 1 is a summary of the Likely Control Measures (LCM) chosen from a prepared list and submitted by each EAC. The table is arranged first by EAC, then by county within each EAC. The fourth column lists the chosen control measures for each county by a numeric ID. This ID identifies each of the control measures listed in Table 2 described next.
3. Table 2 is a slight modification of a list of LCM originally prepared by Dr. Wayne Davis, University of Tennessee, Knoxville, and the Nashville / Davidson County Air Program. This list was sent to all EACs to serve as a starting point for discussions and deliberations, and was specially targeted toward the rural counties. This table provides a brief description of each control measure along with other important information to assist the deliberative process. Each control measure is assigned a unique ID, and it is this ID that is listed in column four of Table 1. Please note that in some cases a reference is made in column four of Table 1 to an attachment. This was necessary when the submitting entity significantly modified or customized the original LCM list, or added additional control measures. Each EAC was encouraged to submit additional control measures tailored to their specific needs. The attached lists are found along with other documentation for each EAC in the tabbed sections of this binder described below.
4. Table 3 summarizes the Control Measures being considered for statewide implementation in Tennessee. Please note that regulatory development is currently underway.
5. Next comes a map of Tennessee detailing the 8-hour 2000-2002 ozone design values and Metropolitan Statistical Areas (MSA and CMSA). Also included is the Lydia Wegman letter dated April 4, 2003 referenced above.
6. Finally, find a tabbed section for each EAC. These sections contain transmittal letters, signature pages, and the LCM lists, some of which may be referenced in column four of Table 1 as discussed above.

## **Review Checklist for June 16, 2003, Control Measures List**

- 1. Did the Early Action Compact area submit an identification and description of control measures being considered by the local area? YES**
- 2. Was this list of controls submitted (postmarked or emailed) no later than June 16, 2003? YES**
- 3. What date was the list of controls submitted?  
Submitted to EPA June 12, 2003**
- 4. Who submitted the list of controls?  
Barry R. Stephens, P.E.  
Director, Division of Air Pollution Control**
- 5. Does it appear that the control measures contained in the June 16 list of controls can be implemented in this specific EAC area? YES**
- 6. Does it appear reasonable that the list of controls can be implemented within the time frame of the EAC, i.e., no later than 2005? YES**

**Table 1**  
**Tennessee Likely EAC Control Measure Summary Table**

	EAC	TN County	Chosen Control Measures By ID
1.	Chattanooga	Hamilton	3, 4, 5, 7, 8, 9, 10, 15, 16, 17, 21, 22, 23, & items 2, 3, 8 from custom list
2.		Marion	3, 4, 5, 7, 8, 9, 10, 15, 16, 17, 21, 22, 23, & items 2, 3, 8 from custom list
3.		Meigs	3, 4, 6, 8, 9, 10, 11, 14, 16, 18, 19, 20, 21, 22, 23
4.	Haywood	Haywood	3, 14, 15, 16, 20, 23, 25, 26, & item 9 in attached list
5.	Knoxville	Anderson	Control Measures 1-27
6.		Blount	Control Measures 1-27
7.		Jefferson	3, 7, 8, 12, 14, 15, 19, 22, 23, 25, 26
8.		Knox	Control Measures 1-27
9.		Loudon	Control Measures 1-27
10.		Sevier	Control Measures 1-27
11.		Union	Control Measures 1-27
12.	Lawrence	Lawrence	Opting out
13.	Memphis	Fayette	2, 4, 8, 9, 12, 15, 16, 17, 19, 21, 26, 27, & item 8 on attached list
14.		Shelby	See attached list of custom measures and descriptions for county
15.		Tipton	2, 4, 8, 9, 12, 15, 16, 17, 19, 21, 26, 27, & item 8 on attached list
16.	Nashville	Cheatham	12, 16, 19, 25
17.		Davidson	See attached list of custom measures and descriptions for county
18.		Dickson	Control Measures 1-27
19.		Robertson	5, 8, 10, 14, 16, 17, 19, 25. See also items 5, 6 on attached list.
20.		Rutherford	See attached list of custom measures and descriptions for county
21.		Sumner	1, 2, 4, 5, 6, 9, 11, 14, 15, 16, 17, 19, 20, 22, 23, & see items 15, 16, 20 from county custom list. See also custom lists for Hendersonville, Millersville, White House
22.		Williamson	Control Measures 1-27
23.		Wilson	1, 2, 3, 5, 6, 7, 12, 13, 15, 16, 18, 20, 22, 26, & item 15 from attached list
24.	Putnam	Putnam	1, 5, 6, 10, 12, 14, 15, 16, 17, 25, 26, 27, & item 2 on attached list
25.	Tri-Cities	Carter	See attached custom list for entire EAC
26.		Hawkins	
27.		Johnson	
28.		Sullivan	
29.		Unicoi	
30.		Washington	

**TABLE 2**  
**LIST OF LIKELY TENNESSEE EAC CONTROL MEASURES**

ID	Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=State wide
1	Mobile LDGV, HDGV	Support evaluation of an IM program EAC-wide or Statewide	NOx, VOC, CO	M	R	L and/or S
2	Mobile LDV	Free gas cap replacement program (in conjunction with IM)	VOC	M	R	L and/or S
3	Mobile	Local governments investigate installation of fuel infrastructure and conversion of local government fleets to alternative fueled vehicles	NOx, VOC, CO	M	R, V	L
4	Gasoline refueling stations	Implement or expand Stage I and or Stage II in all MSA counties	VOC	S	R	L and/or S
5	Stationary NOx sources	Support statewide NOx RACT Low NOx combustion controls	NOx	S	R	L and/or S
6	On-road HDDV and Buses	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC, CO	M	V	L and/or S
7	On and Off Road Diesel Vehicles	Retrofitting local government vehicles (diesel fleets including school buses)	NOx, VOC, CO	M	R, V	
8	On and Off Road Diesel Vehicles	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC, CO	M	V	L and/or S
9	On and Off Road Diesel Vehicles	Encourage use of catalysts and low sulfur diesel	NOx	M	V	L and/or S

ID	Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=State wide
10	On and Off Road Diesel Vehicles	Support the use of Cetane diesel fuel additive	NOx	M	R	L and/or S
11	Fleet Vehicles	Propose accelerated replacement with newer lower emitting vehicles or with vehicles using cleaner fuels.	NOx, VOC,CO	M	V	L and/or S
12	On-road vehicles	Traffic signalization/synchronization	NOx, VOC,CO	M	V	L
13	On-road vehicles	Roadside assistance/incident management program	NOx, VOC,CO	M	V	L
14	HDDV and buses	Truck stop electrification/Anti-idling regulation	NOx, VOC,CO	M	V/R	L
15	All categories	Air Quality Action Day (AQAD)	NOx, VOC,CO	C	V	L and/or S
16	Open burning	Open burning ban--perhaps on ozone action days	NOx, VOC,CO	S	R	L
17	On-road HDDV trucks	Support reducing speed limit on ozone action days (or for the ozone season)	NOx	M	V	L and/or S
18	On-road vehicles	Transportation management plan for large employers	NOx, VOC,CO	M	V	L
19	On-road vehicles	Area wide rideshare incentives	NOx, VOC,CO	M	V	L

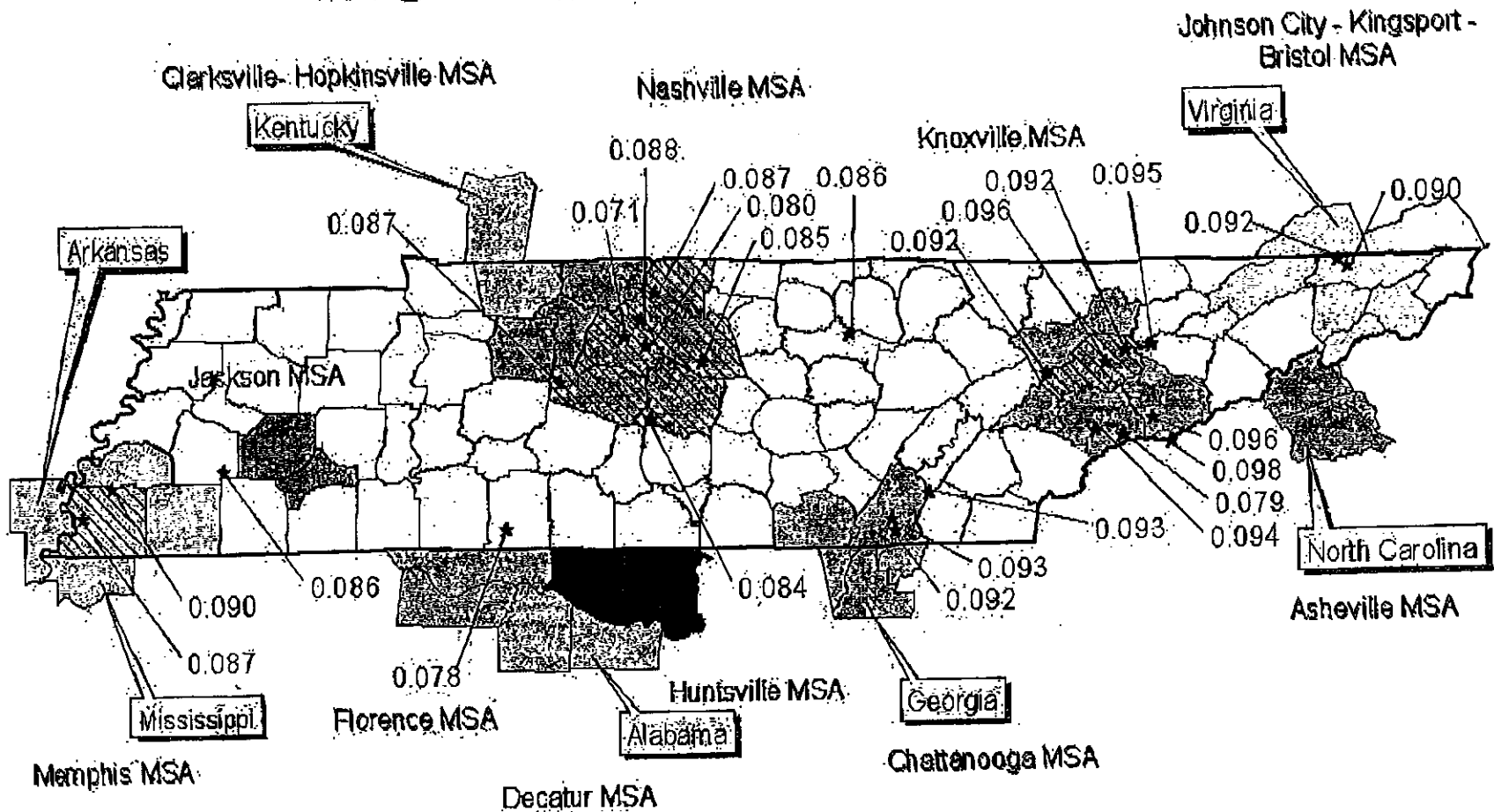


ID	Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=State wide
20	On-road vehicles	Support the enforcement of the smoking vehicle reg. similar to Davidson County to remove gross emitters from road	NOx, VOC, CO	M	R	L and/or S
21	All gasoline engines	Support lower gasoline RVP	VOC	M	R	S
22	All diesel engines	Participate in a regional initiative to seek early introduction of ultra-low sulfur diesel fuel	NOx, VOC, CO	M	R, V	L or S
23	TDOT	Support giving preference to bidders on state jobs with repowered, rebuilt or refueled diesel equipment	NOx, VOC, CO	M	R	S
24	Trip Reductions	Employer-based trip reduction plans	NOx, VOC, CO	M	V	L and/or S
25	All	Student outreach through education systems; educate future drivers on the impact of motor vehicles on the environment	NOx, VOC, CO	M	V	L
26	All	Public education at community events	NOx, VOC, CO	C	V	L
27	All	Air quality web page/public information	NOx, VOC, CO	C	V	L
	<b>OTHERS---</b>					

**TABLE 3**  
**LIST OF LIKELY TENNESSEE EAC CONTROL MEASURES**  
**BEING CONSIDERED FOR STATEWIDE IMPLEMENTATION**  
**(REGULATORY DEVELOPMENT UNDERWAY)**

ID	Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=State wide
1	Mobile	Expanding scope of IM program to include heavier weight vehicles (up to 10,000 GVWR) in Middle Tennessee only	NOx, VOC, CO	M	R	S and/or L
5	Stationary & Mobile NOx sources	Drafting statewide NOx RACT Rule -The rule is for NOx generating sources and facilities. The target is 50 TPY. It will require a RACT determination or verification of non-applicability.	NOx	S & M	R	S and/or L
10	On and Off Road Diesel Vehicles	Support the use of Cetane diesel fuel additive	NOx	M	R	S and/or L
14	HDDV and buses	Drafting statewide Anti-idling rule	NOx, VOC, CO	M	R	S and/or L
20	On-road vehicles	Drafting smoking vehicle reg. similar to Davidson County to remove gross emitters from road	NOx, VOC, CO	M	R	S and/or L
	<b>Other</b>					
	On-road vehicles	Drafting statewide vehicle Anti-tampering rule	NOx, VOC, CO	M	R	S and/or L

# Tennessee 8 Hour Ozone Design Values By MSA 2000 - 2002



Notes:  
 Design values in parts per million.  
 Old 1-hr nonattainment areas in hatched areas.  
 A county with a design value greater than or equal to 0.085 ppm is violating the standard.

★ Monitoring Sites With an 8 Hr Ozone DV

